

## **Select List of Requested Clarifications from EPA's January 15, 2008 Comments on the Round 2 Report**

### **General Comments**

1. **Streamlining Presentation of Data:** Comments 1 and 178 note the need to streamline the data presentation for the RI relative to what was presented in the Round 2 Report. Comment 180, calls for development of maps for at least 14 (up to 40+) additional chemicals. Comments 178 and 235 indicate a need for development of cross-media/multi-media mapping presentations. The LWG seeks clarification on the comment recommendation for streamlining in light of comment recommendations for increased data presentation (more analytes) and additional map types.
2. **General Comment 2:** This comment uses the benthic community as an example of considering risks for individual samples. Is this comment specific to the benthic risk assessment, or does this comment apply to all receptors (specifically related to identifying data points that exceed risk-based criteria)? Clarification is also requested as to exactly what is meant by risk-based criteria?
3. **Uncertainty Discussions:** Comments 3, 291, and 387 indicate that discussion of the uncertainties associated with the exposure assumptions and the effects assessment should be presented exclusively in the uncertainty section of the baseline risk assessments. Clarification on EPA's suggestion here is needed, in light of comments 292 and 305, which indicate that EPA wants uncertainty information associated with the clam tissue analyte lists and assumptions of percent inorganic arsenic in shellfish to be included in the associated section within the body of the baseline risk assessment.

### **Executive Summary**

4. Comment 4: Clarification as to exactly what EPA is looking for in an Executive Summary that was not provided in the Round 2 Report Executive Summary?

### **Section 1**

5. Comment 7 indicates that EPA does not agree with the PRG/AOPC approach presented in the Round 2 Report. Clarification is needed as to how should lines of evidence be used in the risk assessment? Further, clarifying discussions will be needed on PRG development.

### **Section 3**

6. Comment 52 refers to the role of bank armoring and bank erosion. It is not clear what edit is being requested on bank stabilization.
7. Comment 27 directs that TZW be evaluated on a concentration basis at the point of discharge. Clarification is requested on how this fits into the risk assessment process related to TZW. This clarification relates to the need for clarification on the entire TZW risk assessment framework. (See also comments 104 and 223.)
8. Comment 61 refers to pathways omitted from the human health conceptual site model figure. What is meant by evaporation pathway?

### **Section 4**

9. Comment 76 asks for a summary of flow conditions when both the Willamette and Columbia are at high flow. Clarification is needed on this, as simultaneous high flow rate conditions in both Columbia and Willamette do not occur due to hydraulic interaction between the two.

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10. Comment 78 indicates that TSS data during very high flow events should affect predications. What predictions are being referred to?

## **Section 5**

11. Comment 104 indicates the need for additional presentation of information on the groundwater pathway. What additional pathway analysis is EPA requesting for TZW?
12. Comment 100 states that EPA disagrees that wastewater discharge is a negligible pathway.
13. However, Comment 45 appears to indicate that EPA agrees that that wastewater discharge is not likely to be a significant source of PCBs, DDx, and dioxins/furans to the river. Clarification is requested.
14. Comment 106 indicates that additional information sources should be considered for drainage maps. What specific sources of information is the comment referring to?
15. Comments 112 and 113 address the use of non-LWG stormwater data in loading calculations. Clarification as to how to reconcile these comments with Stormwater Tech Team decisions is requested.
16. Comments 115 and 190 describe a need for additional evaluation of riverbank soils. The LWG needs clarification on exactly what evaluation is being required for these soils and, if data is required, whether DEQ will provide that data through its source control efforts.
17. Comment 122 Item 5 and comment 177 address future discharges. Clarification is requested as to how the LWG should make judgments about future discharges.
18. Comment 121 indicates that all sites should be assumed to be in direct contact with the river. Clarification is needed as to how the specific requested edit is related to this comment.
19. Comment 122. Is there an edit required from Item 1 about links to in-water contamination, or is this just a statement?

## **Section 6**

20. Comment 178, 200, and 235 suggests presentation of multiple media on maps. Clarification is requested as to exactly what combination of media and analytes EPA is interested in seeing.
21. Comment 179 indicates that there are misleading presentations of groundwater data. Clarification is requested as to exactly what groundwater information was misleading?
22. Comments 180 and 205 direct that additional chemicals be addressed in the nature and extent section. Additional clarification is needed on the criteria for determining chemicals mapped for Nature & Extent and whether these lists extend to Fate & Transports and CSM sections.
23. The last part of Comment 180 indicates that upland source areas would be used (at least in part) for AOPC definition. Clarification is needed as to how AOPCs should be partly defined based on upland sources?
24. Comment 194 suggests including clear statements of uncertainty for each major topic of discussion. Clarification is needed as to whether this comment refers to Section 6 or Section 7.
25. Comment 195 suggests changes in the TZW data presentation in Section 6. Clarification is needed as to exactly what changes this comment is requesting.

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26. Comments 201-204 ask for clarifying statements on discussions of various chemicals. This appears to conflict with Comment 1 which says that RI and BRA Reports should rely on figures, tables, and graphs to the extent possible to present trends and patterns. Clarification on what is being requested is needed.
27. Comment 207 requests that it be noted that it is difficult to draw conclusions about biota tissue. Clarification is requested as to why this comment is referring to Section 6.4, which is descriptive in nature and does not present conclusions?

## **Section 7 and Appendix D**

28. Comment 196 indicates that detailed calculations should be presented for TZW sites. The LWG needs clarification about the expected scale of refinement of TZW loading calculations.
29. Comment 211 suggests additional uncertainty discussion for loading estimates. It is unclear what additional uncertainty text is being requested. Additionally, Comment 232 seems to request less discussion of uncertainty/qualifying text. Clarification is needed.
30. Comment 219 suggests that source control stormwater data be used in assessing stormwater loading. Clarification is needed reconcile this request with recent Stormwater Technical Team decisions.
31. Comment 221 states that loading estimates should be presented "as is" without speculation as to whether these could be overestimates or underestimates based on assumptions. Comment 211 states that uncertainty in loading calculations should be described in each section as well as with presentation of summaries and conclusions. Clarification is requested.
32. Comment 241 requests calculation of atmospheric deposition loading to stormwater runoff. We request clarification about what specific calculations are being requested. (See also comments 47 and 102.)
33. Comment 243 for Appendix D suggests that TZW evaluations of metals extend into "non-contaminated" areas. Clarification is needed on how this differs from the analysis presented.
34. Comment 244 seems to suggest greater consideration of upland plumes relative to in-water TZW measurement. It is unclear what figures this comment refers to and what the comment is recommending for the RI.
35. Comment 245 suggests inclusion of "correlations" in the upland groundwater data summary table. It is unclear what correlations this comment is referring to.

## **Appendix F (and related HH text in R2 Report)**

36. Surface Water/Transition Zone Water Framework (Comments 253, 308, 309, 310, 312, 313, 314, 315, 318, 323, 324) - The LWG requests clarification on EPA's approach for evaluating surface water and transition zone water.
  - How are co-located biota used in the screening process? What are considered to be co-located biota?
  - What is the difference between including an evaluation in Section 6 versus the baseline risk assessment?
  - How does EPA want the evaluation incorporated into applicable sections of the baseline risk assessment?

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- What, if any, additional steps are allowed following the screening step for those constituents that exceed screening levels?
37. Diver Scenario (Comment 254). Clarification: Is EPA directing the LWG to adopt the diver scenario that was previously provided by EPA, or can some of the exposure assumptions be discussed further?
  38. PBDEs (Comment 331). Is EPA asking the LWG to evaluate the Round 3 analyses for PBDEs as part of the baseline HHRA?
  39. Comments 276, 286, 333. The LWG would like clarification on what, if any, specific changes are being requested in these Appendix F comments.
  40. Comment 304 states that the text discussing upstream fish tissue sample data should be deleted from the RI. However, Comment 10 states that upstream tissue data can be used for informational purposes. Clarification is requested

## **Appendix G**

Comments needing additional clarification for the BERA will be provided once EPA comments on the BERA problem formulation and TRVs.

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Page 4 of 4